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Republican National Committee

Counsel's Office

March 1, 2001

Mr. Dominick Ciaraldi
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Identification Number: C00003418

Reference: September Monthly Report (8/1/00-8/31/00)

Dear Mr. Ciaraldi:

This letter is in response to your correspondence dated February 14, 2001, seeking additional information relating to the Republican National Committee's (RNC) 2000 September Monthly Report.

Inquiry is made regarding certain RNC non-federal transfers to the federal account, "which occur outside the permissible transfer period." After examining its records the Committee is unaware of any such transfers. Accordingly, the RNC requests the Commission to provide the identity of the questioned transfers in order to provide a specific response.

Regarding your inquiry relating to certain administrative expenses, the RNC will amend its reports to reflect federal disbursements and is making the appropriate re-imbursments to the non-federal account. The RNC takes the position that since these transactions could be paid with 100% non-federal funds based on the FEC's own regulations and Advisory Opinions, the RNC could also pay for these expenses on the federal/non-federal split. Nevertheless, please be advised that these adjustments and amendments will be made for similar transactions on all subsequent filings.

Regarding the question of voided checks, please see the attached amendment reflecting checks that were re-issued.

Since most checks are voided in the same month no transfers from the non-federal account would have been made. If a check were voided in a different month after the reporting of the particular payment to a vendor, the appropriate amount would be